



South Coast
Air Quality Management District

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City of Claremont Redevelopment Agency
P.O. Box 880
207 Harvard Avenue
Claremont, CA 91711

**Draft Environmental Impact Report (Draft EIR) for the Proposed Base Line Road
45-Unit Affordable Housing**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final Environmental Impact Report prior to approval of the proposed project.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final Environmental Impact Report. The SCAQMD staff would be happy to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

Steve Smith, Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

SS:GM

LAC071003-02
Control Number

Health Risk Assessment

1. On page 3.2-17, the Draft EIR cites the CARB Air Quality and Land Use Handbook's recommendation to avoid siting new sensitive land uses within 500 feet of a freeway. In spite of this recommendation, the Draft EIR states that the proposed project would be approximately 120 feet from the freeway at its closest point.

To evaluate exposure to air toxics from the nearby I-215 freeway, the Draft EIR cites a mobile source health risk assessment (HRA) completed for the Courts at Monte Vista dated January 31, 2007. The Draft EIR states that the Courts at Monte Vista and proposed project sites are similar because of their proximity to the freeway and are within two miles of each other. Although the HRA for the lead agency for the Courts at Monte Vista concluded the health risk to that project would be below 10 in one million, which is not significant; the Draft EIR for the proposed project states that "due to uncertainties associated with current modeling techniques for air toxic exposures from the roadways and the applicability of the Urban Crossroads study to the 45-unit affordable housing site, the impact is classified as significant and unavoidable." The Draft EIR then cites the USC 2005 Children's Health Study and concludes that the proposed project would result in significant impact to children under the age of 18 who would occupy the proposed residences.

SCAQMD staff does not recommend the use of an HRA for one proposed project for a separate unrelated proposed project. Furthermore, if this is done thorough documentation should be included that demonstrates the similarities and differences including topographical maps of both projects with sources and receptors, a detailed comparison of source parameters, assumptions made in the HRA and the modeling files should be included with the Draft EIR.

If a lead agency chooses to site new sensitive land uses within the buffer zones recommend by the CARB Air Quality and Land Use Handbook,. SCAQMD staff suggests that the lead agency report the MATESII carcinogenic health risk associated with the two kilometer by two kilometer grid cell that includes the proposed project in the Final EIR. The MATESII health risk value also includes carcinogenic health risks from other upwind sources besides the freeway, which were left out when only the freeway is modeled.

The MATESII carcinogenic health risk value for the two kilometer by two kilometer grid cell that includes the proposed project is 840 in one million. Since the source to receptor distance is important in determining health risk and the MATESII carcinogenic health risk values represent an average health risk in the associate grid cell, even this value may underestimate the carcinogenic health risk to the proposed project.

2. Because the proposed project is located next to a major roadway, the I-215 freeway; the proposed project is within the 50-foot buffer zone recommended by CARB; and will include sensitive receptors, SCAQMD staff considers it to be an incompatible

land use based on the close proximity to the freeway. Project alternatives analyzed by the lead agency include two alternative site location alternatives, both of which are owned by the lead agency. For both of these alternatives, significant air quality impacts from the freeway are eliminated. However, the lead agency rejects these two alternatives, as well as the other two alternatives, because they “fail to meet one or more of the main project objectives.” It is unclear which project objectives are unmet if the alternative site alternatives are implemented. SCAQMD staff recommends reconsideration of the alternative site alternatives.